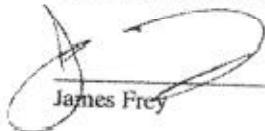


IN WITNESS WHEREOF, the undersigned have caused this Settlement

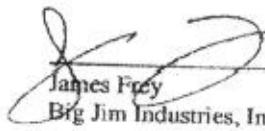
Agreement to be executed as of the dates set forth below:

**FOR THE FREY DEFENDANTS:**



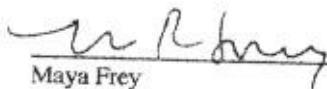
James Frey

Date: 1/2/07



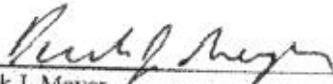
James Frey  
Big Jim Industries, Inc.

Date: 1/2/07



Maya Frey

Date: 1/2/07



Derek J. Meyer

Derek J. Meyer  
McDermott Will & Emery LLP  
227 West Monroe Street, Suite 4400  
Chicago, Illinois 60606  
Attorney for the Frey Defendants

Date: 1/2/07

**FOR THE RANDOM HOUSE DEFENDANTS:**

Robert Sorrentino  
Senior Vice President, Taxes, Random House, Inc.

Date: \_\_\_\_\_

Robert Sorrentino  
President, Doubleday & Company, Inc.

Date: \_\_\_\_\_

Robert Sorrentino  
Vice President, Taxes, Random House VG, Inc.

Date: \_\_\_\_\_

Mark B. Blocker  
Sidley Austin LLP  
One South Dearborn  
Chicago, Illinois 60603  
Attorney for the Random House Defendants

Date: \_\_\_\_\_

**IN WITNESS WHEREOF**, the undersigned have caused this Settlement

Agreement to be executed as of the dates set forth below:

**FOR THE FREY DEFENDANTS:**

James Frey

Date: \_\_\_\_\_

James Frey

Big Jim Industries, Inc.

Date: \_\_\_\_\_

Maya Frey

Date: \_\_\_\_\_

Derek J. Meyer

McDermott Will & Emery LLP  
227 West Monroe Street, Suite 4400  
Chicago, Illinois 60606  
Attorney for the Frey Defendants

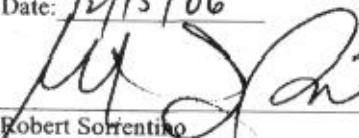
Date: \_\_\_\_\_

**FOR THE RANDOM HOUSE DEFENDANTS:**

  
Robert Sorrentino

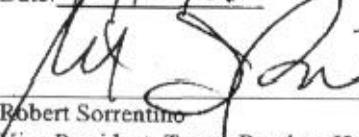
Senior Vice President, Taxes, Random House, Inc.

Date: 12/15/06

  
Robert Sorrentino

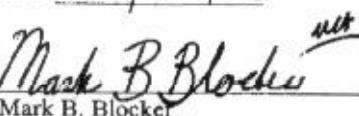
President, Doubleday & Company, Inc.

Date: 12/15/06

  
Robert Sorrentino

Vice President, Taxes, Random House VG, Inc.

Date: 12/15/06

  
Mark B. Blocker

Sidley Austin LLP  
One South Dearborn  
Chicago, Illinois 60603  
Attorney for the Random House Defendants

Date: 12/20/2006

FOR THE PLAINTIFFS:

Marcia Vedral  
Plaintiff Marcia Vedral

Date:

*Larry D. Drury*  
Larry D. Drury  
Larry D. Drury, Ltd.  
205 W. Randolph Street, Suite 1430  
Chicago, Illinois 60606  
Proposed Co-Lead Class Counsel  
Attorney for Plaintiff Marcia Vedral

Date: 12-6-06

Michele Snow

Plaintiff Michele Snow

Date: 12-6-06

*Evan J. Smith*  
Evan J. Smith, Esquire  
Brodsky & Smith, LLC  
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(610) 667-6200  
Proposed Co-Lead Class Counsel  
Attorney for Plaintiff Michele Snow

Date: 12-6-06

Plaintiff Jennifer Cohn

Date:

*Thomas Mullany*  
Thomas Mullany  
708 Third Avenue, Suite 2500  
New York, New York 10017  
Phone: (212) 223-0800  
Liaison Class Counsel  
Attorneys for Plaintiff Jennifer Cohn

Date:

Plaintiff Ann Marie Strack

Date:

*Thomas A. Zimmerman, Jr.*  
Thomas A. Zimmerman, Jr.  
Zimmerman and Associates, P.C.  
100 West Monroe Street, Suite 1300  
Chicago, Illinois 60603  
Attorney for Plaintiff Ann Marie Strack

Date:

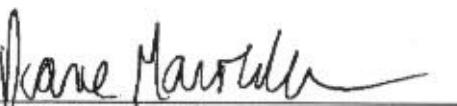
**FOR THE PLAINTIFFS:**

Plaintiff Marcia Vedral

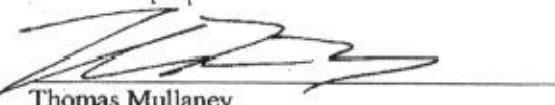
Date: \_\_\_\_\_

Larry D. Drury  
Larry D. Drury Ltd.  
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Chicago, Illinois 60606  
*Proposed Co-Lead Class Counsel*  
*Attorney for Plaintiff Marcia Vedral*

Date: \_\_\_\_\_

  
Plaintiff Marcia Vedral

Date: 12/7/06

  
Thomas Mullaney  
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Phone: (212) 223-0800  
*Liaison Class Counsel*  
*Attorneys for Plaintiff Diane Marolda*

Date: 12.5.2006

Plaintiff Michele Snow

Date: \_\_\_\_\_

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(610) 667-6200  
*Proposed Co-Lead Class Counsel*  
*Attorney for Plaintiff Michele Snow*

Date: \_\_\_\_\_

Plaintiff Ann Marie Strack

Date: \_\_\_\_\_

Thomas A. Zimmerman, Jr.  
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100 West Monroe Street, Suite 1300  
Chicago, Illinois 60603  
*Attorney for Plaintiff Ann Marie Strack*

Date: \_\_\_\_\_

**FOR THE PLAINTIFFS:**

Plaintiff Marcia Vedral

Date: \_\_\_\_\_

Larry D. Drury  
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*Attorney for Plaintiff Marcia Vedral*

Date: \_\_\_\_\_

Plaintiff Jennifer Cohn

Date: \_\_\_\_\_

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Phone: (212) 223-0800  
*Liaison Class Counsel*  
*Attorneys for Plaintiff Jennifer Cohn*

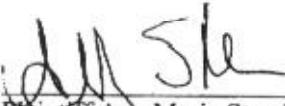
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Plaintiff Michele Snow

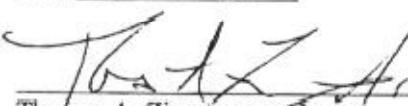
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Brodsky & Smith, LLC  
Two Bala Plaza, Suite 602  
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*Proposed Co-Lead Class Counsel*  
*Attorney for Plaintiff Michele Snow*

Date: \_\_\_\_\_

  
Plaintiff Ann Marie Strack

Date: 12-8-06

  
Thomas A. Zimmerman, Jr.  
Zimmerman and Associates, P.C.  
100 West Monroe Street, Suite 1300  
Chicago, Illinois 60603  
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Date: 12-11-2006

  
Plaintiff Jimmy Floyd

Date: 1/4/07

Alan S. Ripka  
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115 Broadway  
New York, New York 10006  
*Attorney for Plaintiff Jimmy Floyd*

Date: December 5, 2006

Plaintiff Jill Giles

Date: \_\_\_\_\_

Alan J. Statman  
Colleen M. Hegge (of counsel)  
2900 Chemed Center  
255 East Fifth Street  
Cincinnati, Ohio 45202  
*Attorneys for Plaintiff Jill Giles*

Date: \_\_\_\_\_

Plaintiff Pilar More

Date: \_\_\_\_\_

Thomas E. Pakenas  
Dale and Pakenas  
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*Attorneys for Plaintiff Pilar More*

Date: \_\_\_\_\_

Plaintiff Shera Paglinawan

Date: \_\_\_\_\_

Michael David Myers  
Myers & Company, P.L.L.C.  
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*Attorney for Plaintiff Shera Paglinawan*

Date: \_\_\_\_\_

Plaintiff Sara Brackenrich

Date: \_\_\_\_\_

Vincent L. DiTommaso  
DiTommaso & Lubin, PC  
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Oakbrook Terrace, Illinois 61081  
*Attorney for Plaintiff Sara Brackenrich*

Date: \_\_\_\_\_

Plaintiff Jimmy Floyd

Date: \_\_\_\_\_

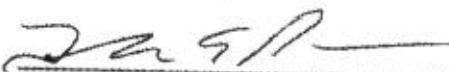
Alan S. Ripka  
Napoli Bern Ripka LLP  
115 Broadway  
New York, New York 10006  
*Attorney for Plaintiff Jimmy Floyd*

Date: 11/29/06



Plaintiff Pilar More

Date: 11/29/06



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Chicago, Illinois 60661  
*Attorneys for Plaintiff Pilar More*

Date: \_\_\_\_\_

Plaintiff Sara Brackenrich

Date: \_\_\_\_\_

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*Attorney for Plaintiff Sara Brackenrich*

Date: \_\_\_\_\_

Plaintiff Jill Giles

Date: \_\_\_\_\_

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Date: \_\_\_\_\_

Plaintiff Shera Paglinawan

Date: \_\_\_\_\_

Michael David Myers  
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Seattle, Washington 98101  
*Attorney for Plaintiff Shera Paglinawan*

Date: \_\_\_\_\_

Plaintiff Jimmy Floyd

Date: \_\_\_\_\_

Alan S. Ripka  
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115 Broadway  
New York, New York 10006  
*Attorney for Plaintiff Jimmy Floyd*

Date: \_\_\_\_\_

Plaintiff Jill Giles

Date: \_\_\_\_\_

Alan J. Statman  
Colleen M. Hegge (of counsel)  
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Cincinnati, Ohio 45202  
*Attorneys for Plaintiff Jill Giles*

Date: \_\_\_\_\_

Plaintiff Pilar More

Date: \_\_\_\_\_

Thomas E. Pakenas  
Dale and Pakenas  
641 W. Lake Street, Suite 400  
Chicago, Illinois 60661  
*Attorneys for Plaintiff Pilar More*

Date: \_\_\_\_\_

Plaintiff Shera Paglinawan

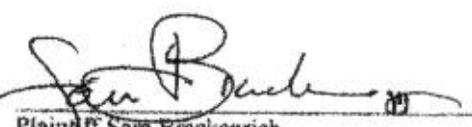
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Plaintiff Wendy Shaw

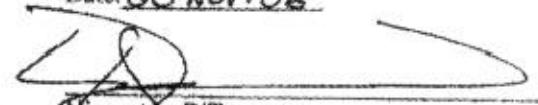
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Michael David Myers  
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1809 Seventh Avenue, Suite 700  
Seattle, Washington 98101  
*Attorney for Plaintiff Shera Paglinawan*

Date: \_\_\_\_\_

  
Plaintiff Sara Brackenrich

Date: 20 Nov. 06

  
Vincent J. DiTommaso  
DiTommaso & Lubin, PC

Plaintiff Jimmy Floyd

Date: \_\_\_\_\_

Alan S. Ripka  
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115 Broadway  
New York, New York 10006  
*Attorney for Plaintiff Jimmy Floyd*

Date: \_\_\_\_\_

Plaintiff Pilar More

Date: \_\_\_\_\_

Thomas E. Pakenas  
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Chicago, Illinois 60661  
*Attorneys for Plaintiff Pilar More*

Date: \_\_\_\_\_

Plaintiff Sara Brackenrich

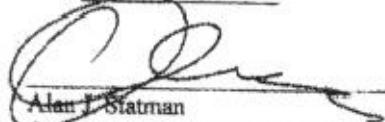
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Vincent L. DiTommaso  
DiTommaso & Lubin, PC  
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Oakbrook Terrace, Illinois 61081  
*Attorney for Plaintiff Sara Brackenrich*

Date: \_\_\_\_\_

*Jill Giles / by her attorney, A.C. Ayer*  
Plaintiff Jill Giles

Date: 12-7-06

  
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2900 Chemed Center  
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Date: 12-7-06

Plaintiff Shera Paglinawan

Date: \_\_\_\_\_

Michael David Myers  
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1809 Seventh Avenue, Suite 700  
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*Attorney for Plaintiff Shera Paglinawan*

Date: \_\_\_\_\_

Plaintiff Jimmy Floyd

Date: \_\_\_\_\_

Alan S. Ripka  
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115 Broadway  
New York, New York 10006  
*Attorney for Plaintiff Jimmy Floyd*

Date: \_\_\_\_\_

Plaintiff Pilar More

Date: \_\_\_\_\_

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641 W. Lake Street, Suite 400  
Chicago, Illinois 60661  
*Attorneys for Plaintiff Pilar More*

Date: \_\_\_\_\_

Plaintiff Sara Brackenrich

Date: \_\_\_\_\_

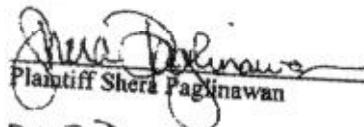
Vincent L. DiTommaso  
DiTommaso & Lubin, PC

Plaintiff Jill Giles

Date: \_\_\_\_\_

Alan J. Statman  
Colleen M. Hegge (of counsel)  
2900 Chemed Center  
255 East Fifth Street  
Cincinnati, Ohio 45202  
*Attorneys for Plaintiff Jill Giles*

Date: \_\_\_\_\_

  
Plaintiff Shera Paglinawan

Date: 3 Dec. 2006

Plaintiff Wendy Shaw

Date: \_\_\_\_\_

  
Michael David Myers  
Myers & Company, PLLC  
1809 Seventh Avenue, Suite 700  
Seattle, Washington 98101  
*Attorney for Plaintiff Shera Paglinawan*

Date: 12.3.2006

Plaintiff Jimmy Floyd

Date: \_\_\_\_\_

Alan S. Ripka  
Napoli Bern Ripka LLP  
115 Broadway  
New York, New York 10006  
*Attorney for Plaintiff Jimmy Floyd*

Date: \_\_\_\_\_

Plaintiff Jill Giles

Date: \_\_\_\_\_

Alan J. Statman  
Colleen M. Hegge (of counsel)  
2900 Chemed Center  
255 East Fifth Street  
Cincinnati, Ohio 45202  
*Attorneys for Plaintiff Jill Giles*

Date: \_\_\_\_\_

Plaintiff Pilar More

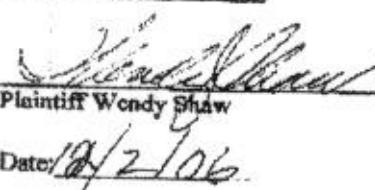
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Thomas E. Pakenas  
Dale and Pakenas  
641 W. Lake Street, Suite 400  
Chicago, Illinois 60661  
*Attorneys for Plaintiff Pilar More*

Date: \_\_\_\_\_

Plaintiff Shera Paglinawan

Date: \_\_\_\_\_

  
Plaintiff Shera Paglinawan

Date: 12/2/06

Michael David Myers  
Myers & Company, P.L.L.C.  
1809 Seventh Avenue, Suite 700  
Seattle, Washington 98101  
*Attorney for Plaintiff Shera Paglinawan*

Date: \_\_\_\_\_

Plaintiff Sara Brackenrich

Date: \_\_\_\_\_

Vincent L. DiTommaso  
DiTommaso & Lubin, PC